

1 **TIFFANY & BOSCO, P.A.**
2 Ace C. Van Patten, Esq.
3 Nevada Bar No. 11731
4 Krista J. Nielson, Esq.
5 Nevada Bar No. 10698
6 10100 W. Charleston Boulevard, Suite 220
7 Las Vegas, NV 89135
8 Telephone: 702 258-8200
9 Fax: 702 258-8787
10 nvbk@tblaw.com
11 TB File No. 19-71022

12 Attorneys for *Secured Creditor* Fay Servicing, LLC

13 **UNITED STATES BANKRUPTCY COURT**

14 **DISTRICT OF NEVADA**

15 IN RE:

16 RICKY J. MONTOYA FDBA
17 LAZYDAYZ OUTDOOR KITCHENS
18 AND HOLLY A PEARCY-MONTOYA,

19 Debtors.

20 BK Case No. 19-10566-mkn

21 Chapter 13

22 **LIMITED RESPONSE TO MOTION
23 TO SELL REAL PROPERTY
24 LOCATED AT: 4108 DOVE CREEK
25 ROAD, NORTH LAS VEGAS, NV
26 89032**

18 **LIMITED RESPONSE TO MOTION TO SELL REAL PROPERTY**

19 Fay Servicing, LLC, Secured Creditor in the above-entitled Bankruptcy proceeding,
20 hereby submits the following limited response to the Debtors' Motion to Sell
21 Real Property located at **4108 Dove Creek Road, North Las Vegas, NV 89032**.

22 Secured Creditor, as first lien holder or agent for the same, does not oppose the sale
23 of the real property provided Secured Creditor's lien will be paid in full subject to the sale
24 closing on within 90 days from the date of the Court's Order and sale is subject to a proper
25 payoff quote; or that any extension of the closing date or sale short of full payoff be subject
26 to Secured Creditor's final approval. Further, funds from the sale should be received by

1 Secured Creditor within ninety (90) days from the date of the Court's order, unless otherwise
2 agreed to by Secured Creditor.

3 DATED this 30th day of September, 2019.

4

5 **TIFFANY & BOSCO, P.A.**

6

7 By /s/ Ace C. Van Patten, Esq.

8 ACE C. VAN PATTEN, ESQ.

9 Attorney for Secured Creditor

10 10100 W. Charleston Boulevard, Suite 220

11 Las Vegas, NV 89135

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

1 **TIFFANY & BOSCO, P.A.**
2 Ace C. Van Patten, Esq.
3 Nevada Bar No. 11731
4 Krista J. Nielson, Esq.
5 Nevada Bar No. 10698
6 10100 W. Charleston Boulevard, Suite 220
7 Las Vegas, NV 89135
8 Telephone: 702 258-8200
9 Fax: 702 258-8787
10 nvbk@tblaw.com
11 TB File No. 19-71022

12 Attorneys for *Secured Creditor* Fay Servicing, LLC

13 **UNITED STATES BANKRUPTCY COURT**

14 **DISTRICT OF NEVADA**

15 IN RE:

BK Case No. 19-10566-mkn

16 RICKY J. MONTOYA FDBA
17 LAZYDAYZ OUTDOOR KITCHENS
18 AND HOLLY A PEARCY-MONTOYA,

Chapter 13

19 **CERTIFICATE OF SERVICE**

20 Debtors.

21 **CERTIFICATE OF SERVICE**

- 22 1. On this 30th day of September, 2019, I served the following documents:

23 **LIMITED RESPONSE TO MOTION TO SELL REAL PROPERTY**

- 24 2. I caused to be served the above-named document by the following means to the
25 persons as listed below:

26 **X a. ECF System**

Narrah F Newark
bk@nnbklaw.com
Attorney for Debtors

Rick A. Yarnall
ecfmail@lasvegas13.com
Trustee

1 **X b. United States mail, postage fully prepaid:**

2 Narrah F. Newark
3 608 S. 8th Street
4 Las Vegas, NV 89101
5 Attorney for Debtors

6 Ricky J. Montoya and Holly A Pearcy-Montoya
7 4108 Dove Creek Rd
8 North Las Vegas, NV 89032
9 Debtors

10 **I declare under penalty of perjury the foregoing is true and correct.**

11 DATED this 30th day of September, 2019.

12 By: /s/ Michelle Benson

13
14
15
16
17
18
19
20
21
22
23
24
25
26